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Attorneys for PLAINTIFFS

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

GIOVANNI MARTINEZ, JOSE
ALMENDARIZ, JAMES KING,
MARTIN SALAZAR, and HUMBERTO
LOPEZ,

Plaintiffs,

v.

FLOWERS FOODS, Inc., FLOWERS
BAKING CO. OF CALIFORNIA,
FLOWERS BAKING CO. OF
HENDERSON, FLOWERS BAKERIES
BRANDS, Inc., and DOES1 through 9,
inclusive,

Defendants.

Case No. 2:15-cv-05112-RGK(Ex)

**DECLARATION OF PETER
RUKIN IN SUPPORT OF
PLAINTIFFS' MOTION IN
LIMINE NO. 3 RE TESTIMONY
OF JOSEPH KROCK, PH.D.**

Complaint Filed: July 7, 2015
Trial Date: August 2, 2016
District Judge: July 18, 2016

1 I, Peter Rukin, declare as follows:

2 1. I am a member of the Bar of the State of California and am admitted to
3 practice before this Court. I am a partner in the law firm of Rukin Hyland Doria &
4 Tindall LLP, co-counsel for Plaintiffs in this action. I make this declaration in
5 support of Plaintiffs' motion in Limine No. 3 Regarding Testimony of Joseph Krock,
6 Ph.D. I have personal knowledge of the facts set forth in this declaration and, if
7 called upon to do so, could and would testify competently thereto, except where I
8 make a statement on information and belief, in which case I am informed and believe
9 the statement to be true.

10 2. Attached as **Exhibit A** is a true and correct copy of the Fed.R.Civ.P.
11 Rule 26(a)(2) disclosure of Joseph Krock, Ph.D

12 3. Attached as **Exhibit B** is a true and correct copy of the Distribution
13 Agreement of Plaintiff Giovanni Martinez.

14 4. Counsel for the parties have stipulated that Dr. Krock will not offer
15 testimony at trial regarding the value of Plaintiffs' routes under an open market
16 prices method of valuation.

17
18 I declare under penalty of perjury under the laws of the United States and the
19 State of California that the foregoing is true and correct.

20 Executed on June 17, 2016 in San Francisco, California.

21 /s/ Peter Rukin

22 Peter Rukin